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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	
)	2:16-CR-0296-JAD-PAL
Plaintiff,)	
)	STIPULATION TO CONTINUE
vs.)	SENTENCING AND DISPOSITION
)	
CHRISTOPHER GUOIN,)	
)	
Defendant.)	

IT IS HEREBY STIPULATED AND AGREED by and between Defendant,
CHRISTOPHER GUOIN, by and through his counsel, TODD M. LEVENTHAL, ESQ., and the
United States of America, by its counsel, SUSAN CUSHMAN, Assistant U.S. Attorney, that the
Sentencing and Disposition in the above-captioned matter currently set for Monday September 11,
2017 be reset for at least 2 weeks during the week of September 18-22, 2017 or September 25-29,
2017.

This Stipulation is entered into for the following reasons

1. Mr. Leventhal is in Trial for U.S. vs. Levine, and will not be available.
2. Mr. Leventhal will commence another trial in October, U.S. vs. Bundy et al, that is expected to last from 7 to 12 weeks. Therefore, the parties request that the matter be reset for the week of September 18-22 or September 25-29 at a time convenient for the court.

3. Mr. Guoin is currently in custody and agrees with this request.

4. Mr. Leventhal has spoken to SUSAN CUSHMAN, Assistant United States Attorney, and she has no objection to continue the hearing.

5. Additionally, denial of this request for a continuance could result in a miscarriage of justice.

DATED this 7th day of September, 2017.

/s/ Todd M. Leventhal
TODD M. LEVENTHAL, ESQ.
Counsel for Mr. Gouin

/s/ Susan Cushman
 SUSAN CUSHMAN
 Assistant U.S. Attorney

Submitted By: LEVENTHAL & ASSOCIATES, PLLC

By: /s/ Todd M. Leventhal

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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**
9

10 UNITED STATES OF AMERICA,)
11 Plaintiff,) 2:16-CR-0296-JAD-PAL
12 vs.)
13 CHRISTOPHER GUOIN,)
14 Defendant.)
15

16 **FINDINGS OF FACT**

17 Based on the stipulation of counsel, and good cause appearing, the Court finds that:
18

- 19 1. Mr. Leventhal is in Trial for U.S. vs. Levine, and will not be available.
20 2. Mr. Leventhal will commence another trial in October, U.S. vs. Bundy et al, that is
21 expected to last from 7 to 12 weeks. Therefore, the parties request that the matter
22 be reset for the week of September 18-22 or September 25-29 at a time convenient
23 for the court.
24 3. Mr. Guoin is currently in custody and agrees with this request.
25 4. Mr. Leventhal has spoken to SUSAN CUSHMAN, Assistant United States
26 Attorney, and she has no objection to continue the hearing.

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5. Additionally, denial of this request for a continuance could result in a miscarriage of justice.

CONCLUSIONS OF LAW

1. For all the above-stated reasons, the ends of justice would best be served by granting the requested continuance of the current Sentencing date to either the week of September 18 through 22 or September 25 through 29 at a time convenient for the court.

ORDER

Accordingly, IT IS SO ORDERED that the current Sentencing of Mr. Guoin is vacated and the same is continued and reset for September 29, 2017, at the hour of 10:00 a.m.

9/8/2017

JENNIFER A. DORSEY
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of September, 2017 a true and correct copy of the,

STIPULATION AND ORDER TO CONTINUE SENTENCING AND DISPOSITION

was filed through the CM/ECF filing system and was electronically served to the following registered addresses on file for this instant case :

Susan Cushman: susan.cushman@usdoj.gov, Christie.M.Sequeira@usdoj.gov,
USANV.team3@usdoj.gov, caseview.ecf@usdoj.gov, denise.cope@usdoj.gov

/s/ Todd M. Leventhal
An Employee of TODD M. LEVENTHAL, ESQ.
LEVENTHAL AND ASSOCIATES, PLLC.